

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:  
ELICK GARCIA

Debtor

§  
§  
§  
§

CASE NO. 10-34357  
CHAPTER 13

**MOTION TO RELEASE FUNDS  
HELD IN THE REGISTRY OF THE COURT**

1. This motion requests an order from the Bankruptcy Court authorizing the person filing this motion to withdraw the funds in this matter deposited by William E. Heitkamp, Chapter 13 Trustee and currently held by the registry of the Court payable to CHKG Escape LTD.
2. Movant: CHKG Escape, LTD.
3. CHKG directly owns and holds a security interest in Debtor's Investment Property (the "Property") with a legal description as follows:

**LOT SEVENTEEN (17) EIGHTEEN (18) AND NINETEEN (19), AND  
LOT LETTERED I OF LOT TWENTY (20), IN BLOCK TWO (2) OF  
ANNEXED GOLDEN ACRES, A SUBDIVISION IN HARRIS  
COUNTY, TEXAS ACCORDING TO THE MAP OR PLAT THEREOF  
RECORDED IN VOLUME 10, PAGE 35, OF THE MAP RECORDS  
OF HARRIS COUNTY, TEXAS.**
4. The monies deposited in the Court's registry were obtained from Debtor in partial payment of the security interest held in Debtor's Investment Property during the pendency of Debtor's bankruptcy.
5. The amount totals Seven Thousand Four Hundred Ninety-Seven and 88/100 Dollars. (\$7,497.88), and are properly due to Movant in partial payment of the security interest it holds in Debtor's Investment Property.
6. Movant hereby requests that the Court release the funds currently in its Registry to CHKG Escape LTD, C/o Christina Minshew Lewis, Lewis & Barnes, 5248 Larkin, Suite A, Houston, Texas 77007.

Date: September 29, 2011.

Respectfully Submitted,

LEWIS & BARNES

/s/ Christina Minshew Lewis

Christina Minshew Lewis

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**Certificate of Service and Certificate of Compliance with BLR 4001**

A copy of this motion was served on the following person below by prepaid United States first class mail. Movant certifies that movant has complied with Bankruptcy Local Rule 4001.

Gipson & Norman  
Jeffrey P. Norman  
450 Texas Avenue, Suite A  
Houston, Texas 77598

/s/ Christina Minshew Lewis

Movant's Counsel